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Counsel for The Southeast Alabama Gas District, American Electric Power, Duke Energy Carolinas, LLC, Virginia Electric and Power Company d/b/a Dominion Virginia Power, Piedmont Natural Gas, Carolina Power & Light Company d/b/a Progress Energy Carolinas, Florida Power Corporation d/b/a Progress Energy Florida, Allegheny Power, CenterPoint Energy Services, Inc., CenterPoint Energy Arkla, CenterPoint Energy Entex, CenterPoint Energy Gas Transmission, Inc. and Shenandoah Valley Electric Cooperative

UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re:)
PILGRIM'S PRIDE CORPORATION, et al.,) Case No. 08-45664 (DML)
) Jointly Administered
Debtors.) Chapter 11
)

VERIFIED STATEMENT PURSUANT TO RULE 2019(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Pursuant to the provisions of Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, Creel, Sussman & Moore, LLP files this Verified Statement of their multiple representations in this case:

- 1. The names and addresses of the creditors represented by Creel, Sussman & Moore, III are as follows:
 - A. The Southeast Alabama Gas District
 Brian Dove
 P.O. Box 1338
 Andalusia, Alabama 36420
 - B. American Electric Power Attn: Gregory Holland 40 Franklin Road P.O. Box 2021

Roanoke, VA 24022-2121

C. Duke Energy Carolinas, LLC

Attn: Yvonne Crenshaw
Duke Energy Corporation
Office of General Counsel

526 South Church Street – EC03T

Charlotte, NC 28202

D. Virginia Electric and Power Company d/b/a Dominion Virginia Power

Attn: Sherry Ward 701 East Cary Street P.O. Box 26666

Richmond, VA 23261-6666

E. Carolina Power & Light Company d/b/a Progress Energy Carolinas, and

Florida Power Corporation d/b/a Progress Energy Florida

Attn: Elaine A. McCallister

160 Rush St. WWI Raleigh, NC 27603

F. Piedmont Natural Gas Company

Attn: Judy Conrad 4339 S. Tryon Street Charlotte, NC 28217-1733

G. Allegheny Power

Attn: Edward Kennedy, Esq. 800 Cabin Hill Drive Greensburg, PA 15601

H. CenterPoint Energy Services, Inc., CenterPoint Energy Arkla,

CenterPoint Energy Entex, & CenterPoint Energy Gas Transmission, Inc.

Attn: Robert Claude, Esq.

Senior Counsel

CenterPoint Energy, Inc.

1111 Louisiana Street

CNP-T 2027

Houston, TX 77002

I. Shenandoah Valley Electric Cooperative

Attn: Allen Ritchie, CFO

147 Dinkel Avenue

P.O. Box 236

Mt. Crawford, VA 22841-0236

- 2. The nature and the amount of claims (interests) and the times of acquisition thereof are as follows:
- (a) The Southeast Alabama Gas District, American Electric Power, Duke Energy Carolinas, LLC, Virginia Electric and Power Company d/b/a Dominion Virginia Power, Piedmont Natural Gas, Carolina Power & Light Company d/b/a Progress Energy Carolinas, Florida Power Corporation d/b/a Progress Energy Florida, Allegheny Power, CenterPoint Energy Services, Inc., CenterPoint Energy Arkla, CenterPoint Energy Entex, CenterPoint Energy Gas Transmission, Inc. and Shenandoah Valley Electric Cooperative all have unsecured claims against one or more of the above-referenced Debtors arising from prepetition utility usage.
- (b) The Southeast Alabama Gas District held a utility bond on one of Debtors' pre-petition accounts, American Electric Power held a deposit on one of the Debtors' prepetition accounts, and Carolina Power & Light Company d/b/a Progress Energy Carolinas held a surety bond on the Debtors' prepetition accounts.
- (c) For more information regarding the foregoing utility companies' interests and claims in this case, refer to the *Objection of the Southeast Alabama Gas District to Debtors' Motion Pursuant to Sections 105(A) and 366 of the Bankruptcy Code to (i) Approve Debtors' Proposed Form of Adequate Assurance; (ii) Establish Procedures for Resolving Objections by Utility Companies; and (iii) Prohibit Utilities from Altering, Refusing, or Discontinuing Service and Objection Of Certain Utility Companies To The Debtors' Motion Pursuant To Sections 105(a) and 366 of the Bankruptcy Code To (I) Approve Debtors' Proposed Form of Adequate Assurance; (II) Establish Procedures For Resolving Objections By Utility Companies; and (III) Prohibit Utilities From Altering, Refusing, or Discontinuing Service previously filed.*

3. Creel, Sussman & Moore, LLP was retained to represent the foregoing creditors in December 2008.

Respectfully submitted,

CREEL, SUSSMAN & MOORE, LLP

/s/ Weldon L. Moore, III
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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2008, I caused a true copy of the foregoing *Verified Statement Pursuant To Rule 2019(a) of the Federal Rules of Bankruptcy Procedure* to be served electronically or by first-class mail, postage prepaid, upon the persons listed below as well as upon the parties receiving notice via the Court's ECF system:

Gary T. Holtzzer Stephen A. Youngman Weil, Gotshal & Manges LLP 200 Crescent Court, Suite 300 Dallas, TX 75201

Victoria Vron Elisa R. Behar Lemmer Weil Gotshal & Manges LLP 767 Fifth Ave New York, NY 10153

U.S. Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-1496

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/s/ Weldon L. Moore, III Weldon L. Moore, III